IN THE UNITED STATES DISTRICT COURT

FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

UNITED STATES OF AMERICA

v.

:

JOSHUAH TAYLOR BRADSHAW

1:22CR<u>356</u>-1

The Grand Jury charges:

COUNT ONE

On or about May 16, 2020, in the County of Hoke, in the Middle District of North Carolina, JOSHUAH TAYLOR BRADSHAW did employ, use, persuade, induce, entice, and coerce Minor-1 to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, as those terms are defined in Title 18, United States Code, Section 2256, using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; in violation of Title 18, United States Code, Section 2251(a) and (e).

COUNT TWO

From on or about May 22, 2020, continuing up to and including on or about August 7, 2020, the exact date to the Grand Jurors unknown, in the County of Hoke, in the Middle District of North Carolina, JOSHUAH TAYLOR BRADHAW did knowingly distribute and attempt to distribute any child

pornography, as defined in Title 18, United States Code, Section 2256(8), that had been shipped and transported using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce by any means, including by computer; in violation of Title 18, United States Code, Section 2252A(a)(2)(A) and (b)(1).

COUNT THREE

On or about May 29, 2020, in the County of Hoke, in the Middle District of North Carolina, JOSHUAH TAYLOR BRADSHAW did employ, use, persuade, induce, entice, and coerce Minor-1 to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, as those terms are defined in Title 18, United States Code, Section 2256, using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; in violation of Title 18, United States Code, Section 2251(a) and (e).

COUNT FOUR

On or about June 12, 2020, in the County of Hoke, in the Middle District of North Carolina, JOSHUAH TAYLOR BRADSHAW did employ, use, persuade, induce, entice, and coerce Minor-1 to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, as

those terms are defined in Title 18, United States Code, Section 2256, using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; in violation of Title 18, United States Code, Section 2251(a) and (e).

COUNT FIVE

On or about August 7, 2020, in the County of Hoke, in the Middle District of North Carolina, JOSHUAH TAYLOR BRADSHAW did employ, use, persuade, induce, entice, and coerce Minor-1 to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, as those terms are defined in Title 18, United States Code, Section 2256, using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; in violation of Title 18, United States Code, Section 2251(a) and (e).

COUNT SIX

On or about August 7, 2020, in the County of Hoke, in the Middle District of North Carolina, JOSHUAH TAYLOR BRADSHAW did knowingly possess any material which contained an image of child pornography, that involved a prepubescent minor and a minor who had not attained 12 years of age, as defined in Title 18, United States Code, Section 2256(8)(A), which had been shipped and transported using any means and facility of interstate and foreign

commerce, and in and affecting interstate and foreign commerce by any means, including by computer; in violation of Title 18, United States Code, Section 2252A(a)(5)(B) and (b)(2).

FORFEITURE ALLEGATION

- 1. The factual allegations contained in this Indictment are realleged and by this reference fully incorporated herein for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 2253.
- 2. Upon conviction of one or more of the offenses alleged in this Indictment, the defendant, JOSHUAH TAYLOR BRADSHAW, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2253(a)(1) and (a)(3), all visual depictions described in Title 18, United States Code, Sections 2251, 2251A, 2252, 2252A, 2252B, or 2260, and any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of Chapter 110 of the United States Code; any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and any property, real or personal, used or intended to be used to commit or promote the commission of the offense or any property traceable to such property.

- 3. The property subject to forfeiture pursuant to paragraph 2 above may include, but shall not be limited to, the following property of the defendant seized on or about August 7, 2020:
 - color iPhone 11 mobile phone, bearing IMEI a. 356547103719092.

All in accordance with Title 18, United States Code, Section 2253, Rule 32.2, Federal Rules of Criminal Procedure, and Title 28, United States Code, Section 2461(c).

DATED: October 31, 2022

SANDRA J. HAIRSTON United States Attorney

BY: K. P. KENNEDY GATES

Assistant United States Attorney

A TRUE BILL:

/ FOREPERSON